



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

July 30, 2013

Allen Richmond,  
AFCEC/CZN  
2261 Hughes Ave., Ste. 155  
Lackland AFB, Texas 78236-9853

Re: EPA comments on the Proposal to Re-locate the 18<sup>th</sup> Aggressor Squadron from Eielson Air Force Based (EAFB) to Joint Base Elmendorf-Richardson, Alaska Rightsizing the Remaining Wing Overhead/Base Operating Support at EAFB, EPA Project # 13-0005-DOD.

Dear Mr. Richmond:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Proposal to Re-locate the 18<sup>th</sup> Aggressor Squadron from Eielson Air Force Based to Joint Base Elmendorf-Richardson, Alaska Rightsizing the Remaining Wing Overhead/Base Operating Support at EAFB (CEQ #20130145). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

We have given the EIS an overall rating of EC-2 (Environmental Concerns-Insufficient Information). A description of our rating system is enclosed. In our previous scoping comments, we identified our concerns with potential impacts to various CERCLA operable units and Records of Decisions at EAFB, and maintenance of existing institutional controls; socioeconomic impacts to the civilian workforce in the greater North Pole area; and economic and environmental impacts within the JBER project area.

Based on our review, we believe that the Draft EIS has adequately analyzed the potential socioeconomic impacts to both the EAFB and JBER project areas, and has developed the preferred alternative (Alternative A) to address some of these concerns. In particular, Alternative A reduces the number of civilian personnel and facilities affected by the relocation and rightsizing over the 2-year transition period. We also recognize that the cumulative effects section has appropriately considered the currently proposed Joint Pacific Alaska Range Complex modernization and enhancement and Army force structure realignment projects, as well as substantial capital projects in the project areas.

We are concerned, however, that the EIS offers limited details in the sections dealing with hazardous materials and CERCLA/hazardous waste sites in relation to the proposed alternatives. As such, it is difficult to determine if changes to existing RODs may be necessary. It is also difficult to determine if there is a likelihood of discovering new sites in the course of demolition and disturbance. As such, we encourage preliminary discussions with the EPA (Deb Yamamoto, EPA Region 10 Federal Facilities Site Cleanup Manager, 206-553-7216 or [yamamoto.deb@epa.gov](mailto:yamamoto.deb@epa.gov)) and other stakeholders regarding the

potential effects to OUs and corresponding RODs, as well as early identification of what changes, if any, may need to be proposed for each site.

We also recommend that the requirement for EPA notification (<http://yosemite.epa.gov/r10/owcm.nsf/d60e13abe847c4cb882564de0071f735/4b62b1400efce5a7882567ed005bb79c!OpenDocument> ) prior to asbestos demolition and removal be included in sections discussing the process of asbestos abatement. For disposal of asbestos and lead, if substantial quantities are anticipated we recommend discussion of the anticipated disposal alternatives and the potential impacts associated with those alternatives. For example, if new asbestos landfill cells or disposal sites will be required due to large quantities of asbestos or lead containing materials, this should be disclosed in the EIS.

Again, we appreciate the opportunity to offer comments on the Draft EIS and look forward to working with you on the final EIS to address the CERCLA-related issues we have identified. Please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.